

S. LANE TUCKER
United States Attorney

SETH M. BEAUSANG
Assistant U.S. Attorney
Federal Building & U.S. Courthouse
222 West Seventh Avenue, #9, Room 253
Anchorage, Alaska 99513-7567
Phone: (907) 271-5071
Fax: (907) 271-1500
Email: seth.beausang@usdoj.gov

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	No. 3:24-cv-00268-SLG
vs.)	
)	MOTION FOR ISSUANCE OF
APPROXIMATELY \$8,998.30,)	WARRANT OF ARREST <i>IN REM</i>
REPRESENTING PROCEEDS FROM)	
THE SALE OF GROUND FISH,)	
)	
Defendant.)	
)	
)	

Plaintiff, United States of America, hereby moves the Clerk of Court to issue a warrant of arrest in rem pursuant to Supplemental Rule G(3)(b)(i). In support, the government states the following:

1. The United States has filed a complaint for civil forfeiture in rem in the above referenced case. This complaint seeks the forfeiture of Defendant Approximately \$8,998.30, Representing Proceeds from the

;

2. The Defendant Approximately \$8,998.30, Representing Proceeds from the Sale of Groundfish, is presently in the possession, custody, or control of the United States and is not presently subject to any judicial restraining order.

Under Supplemental Rule G(3)(b)(i), the Clerk of Court “must issue a warrant to arrest the property [that is the subject of a civil forfeiture complaint] if it is in the government’s possession, custody, or control.” *See also United States v. Four Thousand Eight Hundred Seventy Seven (\$4,877.00) Dollars In U.S. Currency*, No. 1:10CV656- MHT WO, 2010 WL 3172242, at *1 (M.D. Ala. Aug. 11, 2010) (“Because the property is in the government's custody, the clerk may issue the requested warrant for arrest in rem, and there is no need for a district judge to do so.”).

The United States therefore respectfully requests that the Clerk of Court issue the proposed warrant of arrest in rem directing the United States Marshals Service and/or the Department of Homeland Security Investigations to seize the Defendant Approximately \$8,998.30, Representing Proceeds from the Sale of Groundfish.

U.S. v. Approximately \$8,998.30, Representing Proceeds from the Sale of Groundfish
Motion for Issuance of Warrant of Arrest *in Rem*

RESPECTFULLY SUBMITTED December 10th, 2024, in Anchorage, Alaska.

S. LANE TUCKER
United States Attorney

s/ Seth Beausang
SETH BEAUSANG
Assistant United States Attorney
United States of America

CERTIFICATE OF SERVICE

I hereby certify that on December 10th, 2024
a true and correct copy of the foregoing
was served via certified mail on the following:

Arseny Polushkin,
P.O. Box 62
Homer, AK 99603

Nikan Polushkin,
P.O. Box 62
Homer, AK 99603

s/ Seth Beausang
Assistant United States Attorney

U.S. v. Approximately \$8,998.30, Representing Proceeds from the Sale of Groundfish
Motion for Issuance of Warrant of Arrest in Rem